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10 *Attorneys for Defendant Findlay Management Group*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 HOUSTON CASUALTY COMPANY, a  
14 foreign corporation,  
15 Plaintiff/Counterdefendant,  
16 v.  
17 FINDLAY MANAGEMENT GROUP, a  
18 Nevada domestic corporation,  
19 Defendant/Counterclaimant.

Case No. 2:24-cv-01459-GMN-NJK

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
SECOND AMENDED COMPLAINT  
(FIRST REQUEST)**

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1 Pursuant to LR IA 6-1, Plaintiff/Counterdefendant Houston Casualty Company, on one  
2 hand, and Defendant/Counterclaimant Findlay Management Group, on the other hand, by and  
3 through their respective undersigned attorneys of record (collectively, the “Parties”), hereby  
4 stipulate and agree subject to the Court’s approval to extend time for Defendant to respond to the  
5 Second Amended Complaint (ECF No. 27). The current deadline is December 20, 2024. This is  
6 the first request for extension concerning this deadline.

7 1. On October 24, 2024, Defendant filed its Answer and Counterclaim (ECF No. 21) against  
8 Plaintiff. The Court granted additional time for Plaintiff to respond to the Counterclaim  
9 and/or amend its pleading (ECF No. 26).

10 2. On December 6, 2024, Plaintiff filed its Second Amended Complaint (ECF No. 27) against  
11 Defendant.

12 3. The current deadline for Defendant to respond to the Second Amended Complaint (ECF No.  
13 27) is December 20, 2024.

14 4. Subject to the Court’s approval, the Parties have agreed that Defendant shall have additional  
15 time, up to and including January 6, 2025, to respond to the Second Amended Complaint  
16 (ECF No. 27).

17 5. The requested extension to accommodate scheduling conflicts of Defendant’s counsel that  
18 are presented by other matters and commitments that existed before this case was filed as  
19 well as the intervening holidays.

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6. Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

DATED: December 19, 2024

DATED: December 19, 2024

/s/ Rachel L. Wise

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## IT IS SO ORDERED.

**UNITED STATES DISTRICT JUDGE/  
UNITED STATES MAGISTRATE JUDGE**  
Dated: December 20, 2024